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February 28, 2025

Via ECF

Hon. Lewis J. Liman  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1620  
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;  
rel. *Wayfarer Studios LLC et al. v. Lively et al.*, No. 1:25-cv-00449-LJL**

Dear Judge Liman:

We represent Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”) as well as non-parties Tera Hanks, Milica Tošković, and Jariesse Blackmon (collectively, the “Wayfarer Employees”), each of whom is employed by Wayfarer Studios LLC.

In an Order dated February 28, 2025 (Dkt. 102), the Court granted the Wayfarer Parties’ motion to quash subpoenas issued by Blake Lively and Ryan Reynolds (the “Lively Parties”) to cellular providers AT&T, Verizon, and T-Mobile (the “Subpoenas”) to the extent they seek the phone records of the Wayfarer Parties and denied the motion as to the portions of the Subpoenas which seek the phone records of non-parties.

The Subpoenas seek the phone records of the Wayfarer Employees. (Dkt. 76, p. 15, Req. No. 4; Dkt. 77, p. 15, Req. No. 3; Dkt. 78, p. 16, Req. No. 7). The Wayfarer Employees object to the Subpoenas for the same reasons set forth by the Wayfarer Parties. (Dkt. 75, 93).

We respectfully request that the Court so-order this letter quashing the portions of the Subpoenas which seek the phone records of the Wayfarer Employees.

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Respectfully submitted,

/s/ Mitchell Schuster

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